

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**BRUCE A. SENIOR,**

**Plaintiff,**

**v.**

**Civil Action No. 3:18-CV-01382  
Judge Robert C. Chambers**

**ROBERT NEWLIN AIRPORT, INC.  
and CARL BAILEY,**

**Defendants.**

**JOINT MOTION FOR COURT APPROVAL OF SETTLEMENT**

Plaintiff Bruce A. Senior (“Mr. Senior”) and Defendants Robert Newlin Airport, Inc. and Carl Bailey (collectively referred to as “RNA”) through their undersigned counsel, hereby jointly move the Court for approval of a Settlement Agreement entered between the Parties, and for entry of an Order of Dismissal with Prejudice. As set forth more fully in the Memorandum of Law in Support of Joint Motion for Approval of Settlement Agreement and for Order of Dismissal with Prejudice, filed contemporaneously herewith and incorporated herein, the proposed settlement of this matter is a fair and reasonable resolution of a bona fide dispute.

WHEREFORE, for the reasons set forth in the accompanying Memorandum, and other reasons apparent on the record, the parties respectfully request that the Court (1) approve the parties’ settlement, including all of the terms set forth in the Settlement Agreement and Release, and (2) dismiss this lawsuit and Plaintiff’s claims with prejudice.

Respectfully Submitted,

*/s/ Thomas E. Scarr*

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**CERTIFICATE OF SERVICE**

I, Thomas E. Scarr, counsel for Carl Bailey and Robert Newlon Airport, Inc., hereby certify that on August 19, 2019, I electronically filed *Joint Motion for Court Approval of Settlement* by using the CM/ECF system, which will send notification of such filing to the participants listed below:

Mark Goldner, Esq.  
Maria W. Hughes, Esq.  
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/s/ Thomas E. Scarr  
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